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Lead Attorney for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

CENTER FOR BIOLOGICAL DIVERSITY,
et al.,

Case No: 18-CV-1035 (MO)

Plaintiffs;

v.

MUKUMOTO, et al.,

Defendants;

and

OREGON FOREST INDUSTRIES COUNCIL
et al.,

Defendant-Intervenors.

**THIRD UNOPPOSED JOINT
MOTION TO EXTEND DEADLINE
FOR PLAINTIFFS' BILL OF COSTS
AND MOTION FOR ATTORNEY
FEES**

Plaintiffs and State Defendants, Oregon State forestry officials in their official capacities, hereby respectfully request an extension of the current deadline of May 14, 2024 for Plaintiffs to file a bill of costs pursuant to Fed. R. Civ. P. 54(d)(1) and LR 54-1, and their deadline to file a

motion for attorney fees pursuant to Fed. R. Civ. P. 54(d)(2) and LR 54-3, if any (hereinafter collectively “Plaintiffs’ fee motion”).

Plaintiffs and State Defendants have completed their negotiations and have reached an agreement-in-principle that will resolve these matters without the need for Plaintiffs to file a fee motion with the Court. However, to obtain all necessary approvals and administrative matters, the parties request an extension with a new deadline of June 28, 2024. By that date, the parties will notify the Court once they have all final approvals.

In accordance with LR 7-1(a), the undersigned counsel for Plaintiffs conferred with counsel for the Intervenor Defendants Oregon Forest Industries Council and Tillamook County. Each counsel stated they do not oppose.

In summary, granting this motion will allow Plaintiffs and the State Defendants sufficient time to finalize their out-of-court resolution of Plaintiffs’ claim for attorneys’ fees and litigation costs in this matter, and thereby avoid the need for Plaintiffs to prepare and file a fee motion.

Accordingly, in the interest of resolving this matter without the need for Plaintiffs to file a bill of costs and/or motion for attorney fees under Fed. R. Civ. P. 54 and LR 54, Plaintiffs and State Defendants respectfully submit that there is good cause to grant this motion.

DATED: May 13, 2024

Respectfully submitted,

/s/ Deanna J. Chang
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